

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-W
FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHANE M. SELLS,

Defendant.

Case No. 14-CR-

[18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B)]

Green Bay Division **14 - CR 248**

2014 DEC 16 P 1:25

JON W. SANFILIPPO
CLERK

INDICTMENT

COUNT ONE

(Production of Child Pornography)

THE GRAND JURY CHARGES THAT:

Between the years 2004 to 2006 in the State and Eastern District of Wisconsin and
elsewhere,

SHANE M. SELLS

knowingly used known Minor Female A to engage in sexually explicit conduct for the purpose
of producing a visual depiction of such conduct that was recorded by defendant, to wit: an
image of known Minor Female A engaged in the masturbation of his genitals, using material
that had been mailed, shipped, and transported in or affecting foreign and interstate commerce.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

1. On or about August 25, 2014, in the State and Eastern District of Wisconsin,

SHANE M. SELLS

knowingly possessed matter that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported by a means of interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included videos and images identified by the following partial file names:

Partial File Name	Description
Pedoland Frifam 2010 Webcam Stickam Smotri Dad & 3Yo Girl Part 1 (Trade Only)_(new).mp4	The video depicts an adult male and a young female toddler. The male is naked from the waist down. The child is naked and sitting on the male's lap. The male exposes the child's vagina to the camera and fondles the child's vagina occasionally placing his fingers in his mouth before continuing.
PTHC Lexie(95).jpg	The image depicts a very young female child seated on a toilet. The female child is naked and has her legs spread apart with her vagina exposed to the camera.
PTHC Lexie(100).jpg	The image depicts a pre-pubescent female child lying on a bed. The child is naked from the waist down and her shirt is pulled up above her undeveloped breasts. The child's legs are spread exposing her vagina to the camera. The child is holding a stuffed tiger in her left hand.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE NOTICE

Upon conviction of Count One or Two, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offenses, including, but not limited to, the following:

1. HP Compaq Computer, S/N: CNG7500XVD;
2. One Silver Apple tower computer, S/N: G87381ZMUQ2;
3. One Silver Apple G5 tower computer S/N: G85420KXR6U;
4. Any other equipment, instrumentalities, and items used or intended to be used in

the transportation, shipment, production, receiving, distribution, or possession of child pornography.

A TRUE BILL:



FOREPERSON

Dated: 12-16-2014


JAMES L. SANTELLE
United States Attorney